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14 **Pro hac vice application forthcoming*

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16 *MGM Resorts International*

17
18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 DAVID ZUSSMAN, individually and on behalf
21 of all others similarly situated

22 Plaintiff,

23 v.

24 VICI PROPERTIES L.P., et al.,

25 Defendants.

Case No. 2:23-cv-1537-CDS-BNW

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(SECOND REQUEST)**

Pursuant to LR IA 6-1, Plaintiff David Zussman and Defendant MGM Resorts International (“MGM”) respectfully stipulate MGM’s time to respond to the Complaint be extended from the current deadline of December 12, 2023 to and including January 11, 2024. This is the second stipulation for an extension of time to file MGM’s responsive pleading. The court previously granted an extension on October 27, 2023. ECF No. 17.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently ten other related actions filed against MGM pending in the District of Nevada (the “Related Actions”). See *Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481 (D. Nev.); *Zussman v. VICI Properties 1 LLC, et al.*, No. 2:23-cv-01537 (D. Nev.); *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577 (D. Nev.); *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698 (D. Nev.); *Bezack v. MGM Resorts Int’l*, No. 2:23-cv-01719 (D. Nev.) *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981 (D. Nev.); *Owens v. MGM Resorts Int’l*, No. 2:23-cv-1480 (D. Nev.); *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826. One other action is pending in the District of New Jersey. *Lassoff v. MGM Resorts Int’l*, No. 1:23-cv-20419.

The parties in the Related Actions are actively preparing a joint motion to consolidate the Related Actions. As such, additional time is required to permit time to meet and confer with the various parties to the Related Actions and finalize the joint motion.

The Parties’ request is made in good faith to enable the parties to finalize the joint motion for consolidation and conserve judicial and party resources. Moreover, this case is in its infancy, and this request will not prejudice any party.

WHEREAS the Parties respectfully request that MGM shall have until January 11, 2024 to answer, move, or otherwise respond to the Complaint.

Dated: December 11, 2023

Respectfully submitted,

/s/ Nathan R. Ring

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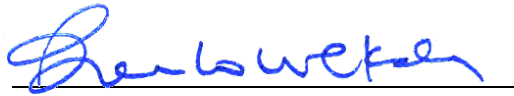
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MGM Resorts International*

IT IS SO ORDERED:



DATED: 12/12/2023